

**JESSE S. KAPLAN CSB#103726**  
**5441 Fair Oaks Bl. Ste. C-1**  
**Carmichael, CA 95608**  
**916/488-3030**  
**916/489-9297 fax**

**Attorney for Plaintiff**  
**STACY SHAW**

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

**-o000o-**

**STACY SHAW,**

**No. 2:25-cv-01432-AC**

**Plaintiff,**

**STIPULATION AND [proposed]  
ORDER FOR EXTENSION OF  
TIME TO FILE PLAINTIFF'S  
REPLY BRIEF**

**v.**

**Frank Bisignano,**  
**COMMISSIONER OF SOCIAL SECURITY,**

**Defendant.**

**/**

IT IS HEREBY STIPULATED by and between the parties, through their respective undersigned attorneys, and with the permission of the Court, that plaintiff's time to file a motion for summary judgment is extended to October 29, 2025.

This is a second extension. The reason for this is that plaintiff may move for a remand on the ground of missing evidence, but there are also further significant problems in this case that

1 has already been to federal court once and now has an official filing date in the year 2011, such  
2 that plaintiff has initiated settlement discussions with defendant.

3  
4 Dated: September 29, 2025

/s/ Jesse S. Kaplan  
JESSE S. KAPLAN  
Attorney for Plaintiff

7  
8 Dated: September 29, 2025

/s/ per e-mail authorization

9 OSCAR GONZALEZ de LLANO  
10 Special Assistant U.S. Attorney  
11 Attorney for Defendant  
12  
13

14 **ORDER**

15 For good cause shown on the basis of this stipulation, the requested extension of  
16 plaintiff's time to file plaintiff's motion for summary judgment is extended to October 29, 2025.

17 SO ORDERED.

18 Dated: September 29, 2025

19 Allison Claire  
ALLISON CLAIRE  
20 UNITED STATES MAGISTRATE JUDGE  
21  
22  
23  
24  
25  
26  
27  
28